



9155 Brown Deer Road,
Ste. 8
San Diego, CA 92121
Phone 858-587-9001
Fax 858-587-8779
www.pulse-link.net

U l t r a W i d e b a n d W i r e l e s s S o l u t i o n s

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

February 7, 2002

RE: Ex Pate Presentation, ET Docket 98-153

Dear Ms. Salas:

This letter was emailed to the FCC and OET today, February 07, 2002. We are aware of the general outlines of the Time Domain proposal on emissions submitted today, February 07, 2002, which we understand may additionally have the support of the NTIA. Our understanding of these is as follows:

Assuming a 1 MHz RBW

Frequency, GHz	Power below Part 15 Class B, dB
Peak >3.25	0
2.75	-1
2.25	-8
2.00	-12
1565 -- 1585	-26
1.00	-26

Notes:

- 1) The ANSI Measurement procedure, C63.4, which is incorporated by reference into the FCC Rules, notes that applicants need not even report measurements that are 26 dB below the specified limit. The lowest such limit currently is the Part 15 general limit. This just further illustrates the extraordinary nature of some of the limits under consideration.

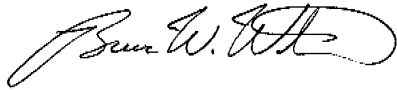
- 2) Emissions below L2 might be dominated by device unintentional emissions.

A shifting of the -12dB point substantially above two GHz will impair the ability of UWB systems to incorporate the tracking and ranging functions while also impairing the ability of UWB to communicate effectively through walls due to increased attenuation at higher frequencies, particularly at the extremely low power levels under consideration.

We agree that shifting the -12dB point substantially above 2 GHz will impair functionality, and further stipulate that there is no technical need or merit to make or suggest such a shift. Doing so will only impair the ability of UWB companies in the US relative to foreign development of the technology that is without question poised to take place.

We at Pulse~LINK support this proposal and hope this can be used as a point of common agreement for a positive ruling on the commercial application of UWB technologies. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce W. Watkins". The signature is fluid and cursive, with the first name "Bruce" and last name "Watkins" clearly distinguishable.

Bruce W. Watkins
President and Chief Operating Officer

Cc: Chairman Michael Powell
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Bruce Franca, Acting Chief, OET
Julius Knapp, Deputy Chief, OET
Rebecca Dorch, Deputy Chief, OET
Dr. Michael Marcus, Associate Chief of Technology, OET
Lisa Gaisford, Chief of Staff, OET
Karen E. Rackley, Chief, Technical Rules Branch, OET
John A. Reed, Senior Engineer, Technical Rules Branch, OET